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Pro Bono Attorneys for Plaintiffs,  
Esvin Fernando Arredondo Rodriguez, A.F.A.J.

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

ESVIN FERNANDO ARREDONDO  
RODRIGUEZ INDIVIDUALLY AND  
A.F.A.J., A MINOR, BY HER GUARDIAN  
AD LITEM, JEFFREY HAMILTON

## Plaintiffs,

VS.

## UNITED STATES OF AMERICA

**Defendant.**

Case No. CV 22-02845-JLS-AFM

**PETITION FOR  
APPOINTMENT OF  
GUARDIAN AD LITEM**

PETITIONER A.F.A.J., by and through her father Esvin Fernando Arredondo Rodriguez, and third-party Jeffrey (“Jeff”) Hamilton respectfully submits this Petition for appointment of a guardian ad litem pursuant to Rule 17(c)(2) of the Federal Rules of Civil Procedure:

- 1       1. Petitioner, born on April 3, 2006, is a minor over the age of 14.
- 2       2. Petitioner is the daughter of Esvin Fernando Arredondo Rodriguez who  
3                  has custody of petitioner.
- 4       3. Jeff Hamilton has been a friend of the Arredondo family since 2018 and  
5                  is a volunteer with the Southern California Catholic Task Force on  
6                  Immigration. He is a retired banker who is also fully accredited by the  
7                  U.S. Department of Justice to represent immigrants in the immigration  
8                  court system. His C.V. is attached hereto as Exhibit A.
- 9       4. Petitioner and her father are residents of the State of California and the  
10                 County of Los Angeles. Jeff Hamilton resides in Orange County.
- 11       5. The minor petitioner resides with her parents but has no appointed  
12                 guardian or duly appointed representative.
- 13       6. The minor petitioner has claims against the above-named defendants on  
14                 which a suit has been brought in this court. The claims arise under the  
15                 provisions of the Federal Tort Claims Act, 28 U.S.C. §§ 1346(b), 2671–  
16                 2680.
- 17       7. Jeff Hamilton is able and willing to serve as guardian ad litem of the  
18                 minor petitioner. He has no interests adverse to that of the minor  
19                 petitioner, has no financial or business relationship with any party to the  
20                 case, and is fully competent and responsible to act as guardian ad litem in  
21                 the prosecution of the action for A.F.A.J.
- 22       8. Petitioner and petitioner's parents consent to the appointment of Jeff  
23                 Hamilton as guardian ad litem.
- 24       9. Pursuant to Local Rule 7-3, counsel for Plaintiffs contacted counsel for  
25                 Defendant regarding this Petition. Defendant does not oppose this  
26                 Petition.

1 THEREFORE, A.F.A.J. respectfully requests that Jeff Hamilton be appointed  
2 guardian ad litem for A.F.A.J. for the purpose of prosecuting petitioner's claims  
3 against the above-named Defendant.

4

5 Respectfully Submitted,

6 Dated: December 19, 2022

7 **MILBANK LLP**

8 By: 

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23 *Pro Bono Attorneys for Plaintiffs*

## VERIFICATION

I, Jeff Hamilton, am a friend of the Arredondo Rodriguez family and a volunteer with the Southern California Catholic Task Force on Immigration. I have read the foregoing petition and know the contents thereof. I have read the foregoing petition and know the contents thereof. Said petition is true of my own knowledge, except as to those matters which are presented on an information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: December 17, 2022

By:

Jeff Hamilton

## **CONSENT TO ACT AS GUARDIAN AD LITEM**

I consent to the appointment as guardian ad litem of A.F.A.J. under the above Petition.

Dated: December 17, 2022

By:

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Jeff Hamilton